

**REMARKS**

Claims 1-11 are pending in the application. Claims 1, 3, 7, and 9 have been amended, and claim 11 is new. Support for the amendments and the new claim is believed to be found at least at page 7, lines 20-22, page 8, lines 14-21, page 9, lines 5-10, page 10, line 5, page 11, lines 6-14, page 13, lines 12-20, page 14, lines 1-5, and FIG.'s 2, 4-9. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

Claims 1, 3-7, and 9 are rejected under 35 U.S.C. 102(b) as being anticipated by Anerrousis ("An Architecture for Building Scalable, Web-Based Management Services", Journal of Network Systems Management, Vol. 7, No. 1, 1999). Applicants respectfully traverse the rejection in view of the amendments to claims 1 and 7, and the following arguments. Amended claim 1 recites, in part, a message compiler for compiling messages; [and] a message storage unit for storing the messages directly from the message compiler in the database. The Office Action cites Anerrousis, figure 7, page 97, paragraph 4 for anticipating claim 1. (Office Action, page 3, middle of the page). But, Anerrousis does not disclose a system as claimed above where the messages are not analyzed before being stored in a database. Statistical analysis appears to occur in Anerrousis as the messages are collected. (Anerrousis, page 98, first paragraph). This defeats one of the advantages of the claimed invention of separating the statistical calculation and the storing of the messages for load balancing. See, Application, page 13, lines 21-22, and page 14, lines 1-4.

Further, amended claim 7 recites, in part, retrieving subsets of the stored messages using a Structured Query Language (SQL), but Anerrousis does not teach using SQL for retrieving stored messages.

Further, amended claim 7 recites, in part, storing the file in a second database; retrieving the file from the second database based on the statistical functions; and performing a second set of statistical functions on the retrieved subsets of messages in the file. That is the claimed invention stores the calculation of the statistical results on message data along with the message data used to compute the calculation. The message data is stored in a "structural document format" (Application, claim 7), where the column name and column type are stored with the message so that further statistical analysis can be performed on the message data. The Office Action cites Anerrousis, page 97, paragraphs 2-3 for anticipating these limitations (Office

Action, page 4, middle of the page), but Anerrousis does not store the messages with their column name and column type information used to compute the statistical analysis, and Anerrousis does not appear to permit further statistical analysis to be performed on the original messages without accessing the messages from the message database.

Further, amended claim 7 recites, in part, remotely viewing the file including results of the statistical functions and the subsets of messages from a web browser using a definition file for a viewpoint. The Office Action cites Anerrousis page 97, paragraphs 2-3 for anticipating these limitations, but Anerrousis uses a Java applet to accomplish the different views, whereas the claimed invention of Application uses a definition file for a viewpoint, such as an XSL file as claimed in claim 11 of Application. A Java applet is not a definition file. For at least each of the foregoing reasons, the rejection under 35 U.S.C. § 102(b) should be withdrawn.

Claims 2, 8, and 10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Anerrousis in view of McHugh et al. ("Proceedings of the 25<sup>th</sup> VLDB Conference", Edinburgh, Scotland, 1999). Because claim 2 depends from claim 1 and claims 8 and 10 depend from claim 7, Applicants respectfully traverse the § 103(a) rejection for the same reasons as the §102 (b) rejection given above.

**CONCLUSION**

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance and a Notice to that effect is solicited.

Should any questions remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

Mayer Brown Rowe & Maw LLP

Dated: January 16, 2007

By: 

Yoon S. Ham  
Reg. No. 45,307  
(202) 263-3280

Intellectual Property Group  
1909 K Street, N.W.  
Washington, D.C. 20006-1101  
Telephone: (202) 263-3000  
Facsimile: (858) 263-3300